



May 10, 2024

Hon. Paul Calandra, Minister

Ministry of Municipal Affairs and Housing  
Provincial Land Use Plans Branch  
777 Bay Street, 13<sup>th</sup> Floor  
Toronto, ON M7A 2J3

Via email: [growthplanning@ontario.ca](mailto:growthplanning@ontario.ca)

Dear Minister Paul Calandra:

**RE: Review of Proposed Policies for a New Provincial Planning Policy Instrument**  
**ERO Number:** 019-8462  
**MHBC File:** 24148A

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MHBC are the land use planning consultants on behalf of Catholic Cemeteries & Funeral Services – Archdiocese of Toronto (“CCFS”). Established in 1855, CCFS is a non-profit, religious organization that serves the essential bereavement needs of the Roman Catholic population within the Greater Toronto Area (GTA). CCFS owns and operates 21 cemeteries, 2 funeral homes (with a third opening in 2024) and has landholdings located throughout the GTA in the Province of Ontario.

Cemeteries are considered an essential component to our social infrastructure, yet are often not formally considered in land use planning policy. As the Province proactively plans to accommodate significant population growth, consideration should also be given to the associated increased need for cemetery space. Because of this, CCFS respectfully requests that the Province consider the recommendations included in this letter as part of their review of the proposed new *Provincial Planning Statement*, which will replace *A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020* (“Growth Plan”) and the *Provincial Policy Statement, 2020* (“PPS”).

### **Achievement of Complete Communities**

In the PPS, Section 1.1.1 specifies that cemeteries are a component of healthy, liveable and safe communities. More specifically, policy 1.1.1. b) describes the need to meet long-term needs by accommodating an appropriate range of residential, employment, institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open spaces, and other uses. This policy intent is carried forward in the proposed *Provincial Planning Statement* via policy 2.1.6. a), which specifies:

- "6. *Planning authorities should support the achievement of complete communities by:*
- a) *accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including, schools and associated child care facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;"*

CCFS supports maintaining this policy in the new *Provincial Planning Statement*.

### **Cemeteries as Public Service Facilities**

In the current PPS and proposed *Provincial Planning Statement*, public service facilities are recognized for their role in supporting the establishment of complete communities. Municipalities are required to proactively plan for public service facilities to accommodate projected needs, and are required to be coordinated and integrated with land use planning and growth management. The definition of public service facilities in the proposed *Provincial Planning Statement* is as follows:

*"Public service facilities: means land, buildings and structures, including but not limited to schools, hospitals and community recreation facilities, for the provision of programs and services provided or subsidized by a government or other body, such as social assistance, recreation, police and fire protection, health, child care and educational programs, including elementary, secondary, post-secondary, long-term care services, and cultural services.*

*Public service facilities do not include infrastructure."*

Cemeteries represent an integral component of the fabric of municipalities, as they are a necessary social element servicing society's needs for the memorialization and accommodation of the deceased. In order to more accurately recognize the essential role cemeteries (as defined in the *Funeral, Burial and Cremation Services Act, 2002*) play in supporting community needs, CCFS requests the definition of public service facilities be reconsidered. The following change is recommended:

*"Public service facilities: means land, buildings and structures, including but not limited to schools, hospitals and community recreation facilities, for the provision of programs and services provided or subsidized by a government or other body, such as social assistance, recreation, police and fire protection, health, child care and educational programs, including elementary, secondary, post-secondary, long-term care services, **cemeteries** and cultural services.*

The addition of cemeteries to the public service facilities definition will allow for cemeteries, as a component of public service facilities, to be coordinated, integrated, and comprehensively planned across lower, single and/or upper-tier municipal boundaries, in accordance with policy 6.2.1 of the proposed *Provincial Planning Statement*.

## *Cemeteries as a Permitted Use*

Despite the aforementioned policy identifying cemeteries as a component of complete communities, it is challenging for this policy to be satisfied, as local land use policies largely prohibit the development of cemeteries within settlement areas.

Outside of settlement areas, a number of PPS policies apply, Policy 1.1.5.2 of the current PPS, carried forward in policy 2.6.1. f) of the proposed *Provincial Planning Statement* identifies cemeteries as a permitted use on rural lands in rural areas (i.e. outside of the settlement area and outside of prime agricultural areas) in municipalities. While we recognize the importance of prime agricultural areas, given the nature of cemeteries as largely landscaped open space areas with limited activity, there should be an opportunity for them to be considered within prime agricultural areas subject to criteria.

CCFS recommends that a new policy be added to Section 4.3 on Agriculture. This proposed new policy would include cemeteries as a permitted use under policy 4.3.2, subject to the criteria identified in policy 4.3.5. b), modified with a focus on regional considerations, which permits limited non-residential uses within prime agricultural areas provided that all of the following are demonstrated:

1. *the land does not comprise a specialty crop area;*
2. *the proposed use complies with the minimum distance separation formulae;*
3. *there is an identified need within the planning horizon provided for in policy 2.1.3 for additional land to accommodate the proposed use; and*
4. *alternative locations have been evaluated, and*
  - i. *there are no reasonable alternative locations which avoid prime agricultural areas; and*
  - ii. *there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands."*

The proposed policy would be worded as follows:

*"4.3.2.6. Cemeteries may be permitted in prime agricultural areas, provided that all of the following are demonstrated:*

- "a) the land does not comprise a specialty crop area;*
- b) the proposed use complies with the minimum distance separation formulae;*
- c) there is an identified **regional** need within the planning horizon provided for in policy 2.1.3 for additional land to accommodate the proposed use; and*
- d) alternative **regional** locations have been evaluated, and*
  - i. there are no reasonable alternative locations which avoid prime agricultural areas; and*
  - ii. there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands."*

In summary, CCFS recommends that the Province:

- 1) Maintain policy 2.1.6. a) of the proposed *Provincial Planning Statement*, which recognizes cemeteries as a component of complete communities;

- 2) Amend the definition of public service facilities to recognize cemeteries as public service facilities:  
*"Public service facilities: means land, buildings and structures, including but not limited to schools, hospitals and community recreation facilities, for the provision of programs and services provided or subsidized by a government or other body, such as social assistance, recreation, police and fire protection, health, child care and educational programs, including elementary, secondary, post-secondary, long-term care services, **cemeteries** and cultural services."*
- 3) Maintain policy 2.6.1. f) of the proposed *Provincial Planning Statement*, which identifies cemeteries as a permitted use on rural lands;
- 4) Introduce a new permitted use policy to Section 4.3.2. of the proposed *Provincial Planning Statement* that includes cemeteries as a permitted use, subject to the modified criteria identified in policy 4.3.5. b):  
*"4.3.2.6. Cemeteries may be permitted in prime agricultural areas, provided that all of the following are demonstrated:*  
*a) the land does not comprise a specialty crop area;*  
*b) the proposed use complies with the minimum distance separation formulae;*  
*c) there is an identified **regional** need within the planning horizon provided for in policy 2.1.3 for additional land to accommodate the proposed use; and*  
*d) alternative **regional** locations have been evaluated, and*  
*i. there are no reasonable alternative locations which avoid prime agricultural areas; and*  
*ii. there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands."*

Thank you for the opportunity to comment. We look forward to reviewing the updated *Provincial Planning Statement*. If you have any questions, please do not hesitate to contact our office.

Yours truly,

**MHBC**



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*Cc: Catholic Cemeteries & Funeral Services – Archdiocese of Toronto*